

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re:
Andre Bisasor,
Debtor

Case No. 15-13369
Chapter 7

**MOTION FOR EXTENSION OF TIME TO OBJECT TO
APPLICATION FOR COMPENSATION**

NOW COMES Andre Bisasor, the Debtor in the above captioned matter, and though counsel respectfully moves this Honorable Court for an extension of time until and including May 11, 2016, to file an Objection to Application for Compensation and Reimbursement of Expenses for David G. Baker.

As reason therefor, the Debtor states as follows:

1. This matter was commenced via the filing of a petition for relief under Chapter 13 of the Bankruptcy Code on August 27, 2015.
2. Initially the Debtor appeared pro se.
3. On September 16, 2015, Attorney David G. Baker entered an appearance on behalf of the Debtor.
4. On January 5, 2016, Attorney Baker was granted leave to withdraw as counsel for the Debtor, upon Attorney Baker's Motion, which was filed on January 4, 2016 (Doc. No. 120).
5. Contemporaneously with his Motion to Withdraw, Attorney Baker filed an Application for Compensation and Reimbursement of Expenses (hereinafter "Application") seeking approval of fees in the amount of \$12,250.00 and reimbursement of expenses in the amount of \$124.57 (Doc. No. 119).
6. On January 6, 2016, this matter was converted to a proceeding under Chapter 7 upon the filing of a "Notice of Voluntary Conversion" by the Debtor, now once again acting pro se.
7. On the same date, the Debtor filed a "Notice of Intent to file Response" to Attorney Baker's Application (Doc. No. 126).
8. During the ensuing months, the Debtor attempted to secure representation in this matter to address all outstanding issues, including Attorney Baker's Application.

9. In order to maintain status quo and preserve his right to object to Attorney Baker's Application, the Debtor has filed several requests for additional time to object to the Application, which have been allowed through April 20, 2016.
10. On or about March 29, 2016, Debtor has retained the undersigned counsel to represent the Debtor for the balance of the Chapter 7 proceeding.
11. Counsel requires additional time to familiarize himself with this matter, to review the docket, various documents, and to address a number of outstanding issues in this case, including ascertaining whether – and to what extent, if at all – to object to Attorney Baker's Application.
12. Further, Counsel is away from his office for a previously scheduled vacation during the week of April 18, 2016.
13. During the same week, the Debtor is engaged in a previously planned multi-day conference, the preparation for which occupied the Debtor during the last several weeks.
14. As a result, Debtor and counsel have not been able to arrange a mutually available time to meet and review the necessary documents.
15. Accordingly, Debtor is seeking a further extension until and including May 11, 2016, to file an objection to Attorney Baker's application.
16. The granting of the requested extension will not prejudice any party, including Attorney Baker, in any manner: there is no confirmed Chapter 13 plan through which Attorney Baker's fees – if allowed – could be paid, and there is no forthcoming distribution by the Chapter 7 Trustee, as no bar date has of yet been fixed for the filing of Proofs of Claim.

WHEREFORE, the Debtor respectfully moves this Court to:

1. Grant the Debtor an extension of time until and including May 11, 2016, to file an objection to the Application for Compensation and Reimbursement of Expenses filed by Attorney David G. Baker; and
2. Grant such other relief as this Court deems just and proper.

Respectfully submitted,
Andre Bisasor, Debtor,
By his Attorney,
/s/ Dmitry Lev
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Dated: April 20, 2016

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CERTIFICATE OF SERVICE

I, Dmitry Lev, hereby certify that on April 20, 2016, in accordance with the Bankruptcy Rules and the Local Bankruptcy Rules of this Court, I electronically filed the foregoing document in this matter with the United States Bankruptcy Court for the District of Massachusetts using the CM/ECF system. On information and belief, a Notice of Electronic Filing was transmitted to the following CM/ECF participants electronically:

- ✓ For the United States Trustee: John Fitzgerald
- ✓ For the Chapter 7 Trustee: John Aquino
- ✓ For David G. Baker (interested party): David G. Baker
- ✓ For Greystar Management Services LP as agent for owner RAR2-Jefferson at Dedham Station MA Inc.: Donna Ashton
- ✓ For Foley Hoag, LLP: John C. Ottenberg

Pursuant to MEFR 9, “Transmission by the Court of the ‘Notice of Electronic Filing’ constitutes service or notice of the filed document...”

Respectfully submitted,

/s/ Dmitry Lev

Dmitry Lev, Esq.

BBO # 665236

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Dated: April 20, 2016